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# UNITED STATES DISTRICT COURT

# DISTRICT OF NEVADA

MATHEW J. KING, ) CASE NO.: 2:13-cv-02080-GMN-PAL  
Plaintiff, )  
vs. )  
JAMES G. COX, JENNIFER NASH, )  
QUENTIN BYRNE, CCSIII LEAVITT, )  
CCSIII GRAHAM, CCSIII WUEST, )  
ROLAND DANIELS, CCS SMITH, AMY )  
CALDERWOOD, et al., )  
Defendants. )  
DEFENDANTS' MOTION FOR LEA  
FILE MEDICAL RECORDS UNDER  
AND ORDER

Defendants, Amy Calderwood, James G. Cox, Roland Daniels, Cary Leavitt, Jennifer Nash, Chad Smith, and James Larry Wuest, by and through their counsel, Attorney General Catherine Cortez Masto, and Deputy Attorney General Mercedes S. Menendez, of the State of Nevada, Office of the Attorney General, hereby move for leave to file *under seal* Exhibit G to Defendant's Motion for Summary Judgment, which contain Plaintiff's medical records. This Motion is made and based on the following Memorandum of Points and Authorities as well as all pleadings and papers on file in this case.

## **MEMORANDUM OF POINTS AND AUTHORITIES**

Defendant seeks leave to file Exhibit G to Defendant's Motion for Summary Judgment, consisting of Plaintiff's relevant Medical Records, under seal. Plaintiff's medical records are

1 confidential in nature pursuant to Administrative Regulation 569.02(12) ("Department records,  
2 filed and information pertaining to individual inmates who are not specifically approved for  
3 release in the regulation are confidential"). See NRS 449.720(2); NRS 629.061(5).  
4 Accordingly, Defendant seeks to file Plaintiff's medical records under seal to prevent their  
5 entry into the public record.

6 Based on the foregoing, Defendants respectfully request that this Court grant  
7 Defendants' Motion for Leave to File Under Seal Exhibit G, medical records, in Support of  
8 Defendant's Motion for Summary Judgment.

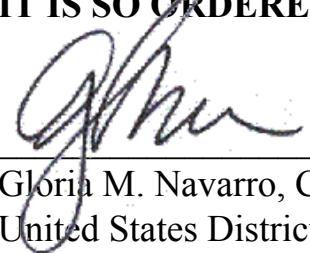
9 DATED this 15th day of December, 2014.

10 Respectfully submitted,

11 CATHERINE CORTEZ MASTO  
12 Attorney General

13 By: /s/ Mercedes S. Menendez  
14 MERCEDES S. MENENDEZ  
15 Deputy Attorney General  
16 *Atorneys for Defendants*

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20 **IT IS SO ORDERED.**  
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Gloria M. Navarro, Chief Judge  
United States District Court

DATED: 01/09/2015